

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANGELITA SANDERS,

Plaintiff,

v.

Civil Action No.: 1:11-cv-02759-JOF

J.C. PENNEY CORPORATION, INC.,

Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

COME NOW, Plaintiff in the above-styled action and, pursuant to Fed.R.Civ.P. 6, files this Motion for Extension of Time to File her Response to Defendants' Motion for Summary Judgment.

1.

On February 6, 2012, Defendant filed a Motion for Summary Judgment. (Doc. # 20).

2.

Pursuant to Notice posted on the CM/ECF system, Plaintiff's responsive brief is due on or before March 2, 2012.

3.

Due to an unusually heavy workload, Plaintiff requests an extension of time of seven days (7) days, thereby making Plaintiff's responsive brief due on or before March

9, 2012. Defendant, through counsel, consents to the extension.

4.

This is the first request for an extension of time related to this motion.

5.

A proposed order is attached hereto.

THIS 24th day of February, 2012.

/s/ Brent J. Savage, Jr.

Brent J. Savage

Georgia Bar No. 627450

Brent J. Savage, Jr.

Georgia Bar No. 940349

Savage, Turner, Pinckney & Madison

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Savannah, Georgia

(912) 231-1140

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that I have on this day filed electronically with the Clerk of the Court the foregoing. By filing in the CM/ECF system I have thereby served by email all of the parties in this case through the following counsels of record:

Edwin L. Hamilton

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GOODMAN, MCGUFFEY, LINDSEY & JOHNSON

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2100 Tower Place

Atlanta, Georgia 30326-1084

Attorneys for Defendant JC Penney Corporation, Inc.

This 24th day of February, 2012.

/s/ Brent J. Savage, Jr.

Brent J. Savage

Georgia Bar No. 627450

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Georgia Bar No: 940349

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J.C. PENNY CORPORATION, INC.,

Defendant.

ORDER EXTENDING TIME WITHIN WHICH TO RESPOND

HAVING READ AND CONSIDERED Plaintiff's Motion for Extension of Time,
IT IS HEREBY ORDERED that Plaintiff is granted an extension of time of seven (7)
days within which to file his responsive brief. Said brief is now due on or before March
9, 2012.

SO ORDERED, this _____ day of _____, 2012.

Judge, Northern District of Georgia

Order prepared by:

Consented to by:

/s/ Brent J. Savage, Jr.

/s/ Joshua S. Stein

Brent J. Savage, Jr.

Joshua S. Stein

Georgia Bar No. 940349

Georgia Bar No. 141925

Savage, Turner, Pinckney & Madison

Goodman McGuffey Lindsey &
Johnson, LLP